



# FACILITY COMPLIANCE AUDIT REPORT

## Division of Waste Management Solid Waste Section

<b>UNIT TYPE:</b>											
Lined MSWLF		LCID		YW		Transfer	<b>X</b>	Compos t		SLAS	<b>COUNTY:</b> Cumberland County <b>PERMIT NO.:</b> 2611-T <b>FILE TYPE:</b> COMPLIANCE
Closed MSWLF		HHW		White goods		Incineration		T&P		FIRM	
CDFL		Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF	

**Date of Audit:** February 3, 2011.

**Date of Last Audit:** June 24, 2009

**FACILITY NAME AND ADDRESS:**

River City Transfer Station  
 1049 South Eastern Blvd  
 Fayetteville, North Carolina 28306

**GPS COORDINATES:** N: 35.02958 E: -78.88111

**FACILITY CONTACT NAME AND PHONE NUMBER:**

Mr. William Hester  
 910-486-4226

**FACILITY CONTACT ADDRESS:**

Mr. William Hester  
 River City Recycling  
 1049 South Eastern Blvd  
 Fayetteville, North Carolina 28306

**AUDIT PARTICIPANTS:**

Drew Hammonds, NCDENR Solid Waste Section  
 Norm Loomis, River City Recycling  
 Mary Whaley, NCDENR Solid Waste Section

**STATUS OF PERMIT:**

Permit to Construct and Operate Issued February 14, 2008  
 Up for review August 31, 2012

**PURPOSE OF AUDIT:**

Comprehensive Audit

**NOTICE OF VIOLATION:**

None

You are hereby advised that, pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$15,000 per day may be assessed for each violation of the Solid Waste Statute or Regulations. For the violation(s) noted here, you may be subject to enforcement actions including penalties, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

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**STATUS OF PAST NOTED VIOLATIONS:**

None

**AREAS OF CONCERN AND COMMENTS:**

1. The hours of operation are Monday – Friday, 6:30am to 5:00pm and Saturday 7:00am – 12:00pm. The facility is currently operating two shifts according to the site manager.
2. A sign is posted at the facility entrance that indicates the permit number, the type wastes that are not allowed and a contact number to call in the event of an emergency.
3. The permit, operations plan, contingency plan, screening records, scrap tire forms, disposal and recycling documentation must be maintained on-site and available for inspection during operating hours.
4. **The permit expires in February 2013.** I recommend that you submit your renewal information to the permitting branch 6 months prior to the expiration date to allow sufficient time for the review process.
5. Permit to operate; attachment 4, number 15 states that “For the processing of Demolition Wastes, an asbestos screening plan must be submitted to the Division of Epidemiology of the Department of Health and Human Services for approval and the approved plan forwarded to the Section for inclusion in the operations plan for the facility. Otherwise, asbestos containing material or material suspected to contain asbestos must not be accepted.”
6. The facility is accepting 40-50 tons per day.
7. The facility access road to the WTS was in good condition at the time of this audit.
8. Past due quarterly reports for the facility that are required per the permit were given to the section staff during the audit.
9. Cardboard and concrete are removed from the waste stream and recycled through local markets, clean wood is removed to be ground for mulch and the plywood is to be ground for boiler fuel.
10. Certified Waste Transfer Station Personnel are:  
**Francisco Alvares**, certification expires, November 13, 2012  
**Pam C. Griffith**, certification expires, December 5, 2011  
**Norm Loomis**, certification expires, December 5, 2011  
**Shelby Anderson**, certification expires, November 13, 2012  
**Roger F. Conway**, certification expires, April 15, 2011
11. Scrap tires that are removed from incoming waste should be placed in a container and disposed of within ten days of receipt or placed in a covered container. Scrap tires removed from the waste stream at the C&D WTS are disposed of at the Cumberland County Landfill.
12. The boundaries of the C&D Transfer were identified with concrete blocks painted red. Ensure that the corners of your facility are permanently marked and visible. The jersey barricades are low to the ground and not visible for inspection or site staff. There is the potential for waste to be stored outside the facility without clearly visible and immobile boundary markers.
13. Permit to operate part number 3. States that the facility is approved to accept a maximum of 100 tons per day of C&D wastes, and **to store less than 100 tons at any given time.** and **6. States the storage capacity for the facility is limited to the areas shown in the approved drawings and as described in the approved Operation Plan as listed in Attachment 1.**
14. There was a large pile of mixed wood waste (plywood, laminates, treated, etc. . .) and a large pile of separated clean wood within the facility footprint and adjacent area at the time of this audit that combined with all other recyclables and waste on site exceeds the 100 ton per day limit for this facility. The piles were at least 20' in height and combined covered approximately ½ acre and were being stored within 15' or less of an existing pond. The site manager stated that the mixed wood waste was to be ground for boiler fuel and the clean wood for mulch and could be processed in three weeks once the grinder comes back from another job site. Remove and dispose or process and remove both of the wood waste piles (clean wood and plywood) that extend from the WTS footprint to the adjacent pond. Dispose or recycle at a facility permitted to accept the waste for disposal or recycling.
15. All waste delivered to transfer facility must be sorted or stored within the limits of the C&D Transfer Facility to include wood chips, concrete and mixed waste soil stockpiles or transported to a permitted facility for disposal or recycling.
16. The old containers full of waste that are establishing vegetations should be removed and emptied at the LF.

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17. The piles of ground plywood-boiler fuel, located behind your office, must be stored in leak proof containers and properly covered.
18. The Permit to Operate part # 16: States that “Except for wood, concrete and aggregate, recyclable materials must be placed in containers by the end of the working day. a) **Recyclable materials placed in containers must be removed from the site once the container is full.** b) **Non-recyclable materials must be securely placed in leak-proof containers or trucks by the end of the operating day and removed from the site once the container is full.**” There were full containers on-site at the time of this audit. There was a pile of scrap metal accumulating outside the WTS boundary on the ground because the excavator was broken. **The facility operations plan part 3.0 Transfer Station Operations states that “Rented, leased or contracted equipment will be used on a case by case basis if surge demand or mechanical failures dictate”.** I recommend that you follow your operations plan in order to remain in compliance with your permit to operate at this facility.
19. **The site manager stated that full containers of drywall recovered from the waste stream is taken to a warehouse and stored until ground. The ground drywall is to be sold as a soil amendment. The operator on site could not remember the location of the warehouse. The permittee is responsible for identifying receiving facilities or end users of waste and recyclables from this site.**
20. Waste residual material swept up/removed from the tipping pad should be disposed of and not stored on the ground for use on site. Remove and properly disposed of the piles of debris collected from the tip pad.
21. Impounded water from this site should not be discharged onto adjacent properties unless it has been discharged through a properly sized soil sedimentation basin.
22. **Asphalt shingles are still being stored on the ground on site.** If shingles are going to be collected at this site, they must be collected, stored in a container and sampled for asbestos.
23. There is nothing in the approved operations plan or permit that allows the grinding of wood waste or shingles at this facility.
24. Any changes to facility operations must be submitted to the Division for approval prior to commencing.
25. **Corrective measures need to continue at the facility to ensure that all waste streams received are either recycled or disposed of off the property and that all waste on-site are less than the 100 tons at the facility at any one time as required in the current permit.**
26. **Corrective actions are needed as a result of this audit and should be complete within 30 days receipt of this audit.**

Digital photos were taken during this audit.



Piles of wood waste extending from tipping pad out.



Scrap metal on ground outside WTS footprint.



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Waste within WTS footprint.



Wood within feet of onsite pond.



Pile of mixed wood waste to be ground for boiler fuel.



View of tipping pad with wood in back.



Waste sweeping from tipping floor.



Wood waste piled along road, pond just right of water tank.



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Another pile of waste sweepings from tipping pad.  
Used on site for filler in holes.



Workers clearing tipping pad. Wood pile and full  
containers in background.

Please contact me if you have any questions or concerns regarding this audit report.



Drew Hammonds  
Environmental Senior Specialist  
Solid Waste Section  
**Regional Representative**

Phone: (910)-433-3351

Delivered on : <u>March 20, 2011</u> by		hand delivery	<b>X</b>	E Mail		Certified No.
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**Ec:**     **Dennis Shackelford, Eastern Area Supervisor**  
         **Donald Herndon, Compliance Officer**  
         **Geof Little, Permitting Branch**  
         **Mary Whaley, Solid Waste Section**  
         **Bill Hester, ICAN/River City Transfer**